

FILED

JUN 26 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARIECE CHEW,

Defendant.

) INDICTMENT

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1:24 CR 00231

CASE NO.

Title 18, United States Code,
Sections 922(g)(1),
924(a)(8), 932(b)(1) and (c)(1)

JUDGE CALABRESE

COUNT 1

(Straw Purchasing of Firearms, 18 U.S.C. §§ 932(b)(1) and (c)(1))

The Grand Jury charges:

1. On or about February 22, 2024, in the Northern District of Ohio, Eastern Division, the defendant CHARIECE CHEW did knowingly conspire with C.C. in the purchase of two firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-49070, and a Romarm Micro Draco pistol, bearing serial number 23PMD-48829, in or otherwise affecting interstate or foreign commerce for, on behalf of, and at the request or demand of CHARIECE CHEW, knowing he had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California; in violation of Title 18, United States Code, Section 932(b)(1).

COUNT 2

(Felon in Possession of Firearms, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

2. On or about February 22, 2024, in the Northern District of Ohio, Eastern Division, Defendant CHARIECE CHEW, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California, knowingly possessed in and affecting interstate commerce firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-49070, and a Romarm Micro Draco pistol, bearing serial number 23PMD-48829, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 3

(Straw Purchasing of Firearms, 18 U.S.C. §§ 932(b)(1) and (c)(1))

The Grand Jury charges:

3. On or about February 29, 2024, in the Northern District of Ohio, Eastern Division, the defendant CHARIECE CHEW did knowingly conspire with C.C. in the purchase of two firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-46205, and a Romarm Mini Draco pistol, bearing serial number 22PG-7029, in or otherwise affecting interstate or foreign commerce for, on behalf of, and at the request or demand of CHARIECE CHEW, knowing he had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT 4

(Felon in Possession of Firearms, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

4. On or about February 29, 2024, in the Northern District of Ohio, Eastern Division, Defendant CHARIECE CHEW, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California, knowingly possessed in and affecting interstate commerce firearms, to wit: Romarm Micro Draco pistol, bearing serial number 23PMD-46205, and a Romarm Mini Draco pistol, bearing serial number 22PG-7029, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE

The Grand Jury further charges:

5. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code Section, 2461(c), the allegations in Counts 1-4 are incorporated herein by reference. As a result of the foregoing offense, Defendant CHARIECE CHEW shall forfeit to the United States any and all firearms involved in or used in the commission of the violations charged in Counts 1-4.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.